UNDERGROUND
ENGINEERING &
ENVIRONMENTAL
SOLUTIONS

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HALEY & ALDRICH

30 June 1998
File No. 94039T1

New Jersey Department of Environmental Protection
401 East State Street, CN-028
Trenton, NJ 08625

Attention: Joseph J. Nowak

Subject: Response to the NJDEP Letter of 27 May 1998 and Request for Meeting
Hexcel Corporation Facility, Lodi Borough, Bergen County
ISRA Case No. 86009

Dear Mr. Nowak:

On behalf of Hexcel Corporation (Hexcel), this letter is a response to the New Jersey Department of Environmental Protection (NJDEP) letter of 27 May 1998. Hexcel's overall response is that they are currently in the process of developing a plan for comprehensive and fast-track remediation of the site. As we have discussed with you by phone, Hexcel has reached a point in its negotiations with other parties in the area that it has determined it will move ahead expeditiously with developing a remediation plan of the Hexcel property alone, independent of other parties' issues. There still is the possibility that, in the future, there will be a regional approach to remediation or redevelopment of the area that will incorporate the Hexcel property. However, Hexcel will proceed with its own remediation without waiting for details of these possibilities. Hexcel's goal for its comprehensive plan is for the concept to be presented to the NJDEP in a meeting, to be followed thereafter by a document. The follow-up document can then reflect the issues that develop from discussions with the NJDEP.

Hexcel hereby requests a meeting with the NJDEP in October or as soon thereafter as possible. At this meeting, Hexcel will present its plans for remediation of the site.

The remainder of this letter is presented in the format of item by item responses to the NJDEP's letter.

I. Soil

1. Hexcel will include remediation of soil in the comprehensive plan discussed above.

II. Groundwater

1. As discussed above, a comprehensive plan for the site is being developed. Primary in the plan's scope will be the issue of how groundwater is to be remediated.

2. Hexcel will develop its remediation plan with NJDEP's requirements in mind as outlined in this item.

3. No response needed.

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4. Hexcel will collect samples from the Saddle River. The sample plan will be included in Hexcel's July progress report.

5. The data indicate the silt layer extends beneath Building 2. Hexcel has reviewed the contour map of the silt layer's upper surface (submitted in February 1991) and has taken a closer look at the silt layer in the area of Building 2. Based on the known subsurface information, the top of the silt layer in the general area of monitoring wells MW-26, RW6-2 and RW6-1 exists between the elevations of 14 ft and 10 ft and extends down to an elevation between 7 ft and 4 ft (NGVD 1929). As shown on the cross-section A-A' (Figures 1 and 2), a concrete subsurface basin is believed to be located beneath Building 2. This basin has been observed in construction drawings and aerial photographs of the site. According to site personnel, the basin was backfilled prior to the construction of Building 2. Based on the boring logs from MW-26 and RW6-2, the floor of the basin is at an elevation of approximately 14.5 ft. It appears that the basin has been constructed into the silt layer with a few feet of construction fill existing underneath the basin, but that several feet of the silt material extend beneath the construction fill.

   The presence of DNAPL under Building 2 is sufficiently monitored by monitoring wells MW-26, RW6-1 and RW6-2. According to well construction details and field measurements, monitoring well MW-26 is screened directly below the basin's floor and in the construction fill overlying the silt. Monitoring wells RW6-1 and RW6-2 are screened on top of the basin's floor. Therefore, MW-26 is appropriately constructed to monitor for the presence of DNAPL on the silt under the basin's floor. Conversely, RW6-1 and RW6-2 are appropriately constructed to monitor for DNAPL on top of the basin's floor. DNAPL has not been observed at measurable quantities at MW-26 since 31 August 1995, since 10 April 1995 at RW6-1 and at least since October 1994 in RW6-2. Therefore, it appears that DNAPL is not present in significant quantities under Building 2.

   The depression in the silt layer centered on monitoring wells RW7-4 and RW7-5 does not appear to extend toward MW-26. Based on the current information, the depression on top of the silt layer centered on RW7-4 and RW7-5 is the lowest point of the silt in this area. In addition, DNAPL has not been observed at measurable quantities at RW7-5 since 10 October 1991 and since 10 May 1994 in RW7-4. Nevertheless, the location of DNAPL is an important consideration and will be a major factor in the design of the remediation plan.

6. Hexcel will consider Napp Technologies, Inc. (Napp) groundwater sampling data and well locations as well as historical groundwater data from Hexcel's wells in its evaluation and proposal of further groundwater sampling (see Item 13 for further reference).

7. No response needed.

8. Hexcel has surveyed the Army Corps of Engineers monitoring well MW08. The results and a cross section were included in Hexcel's 28 January 1998 progress report.

9. We have rechecked the measurement that led to concern about sediment in MW-8 and the measurement was incorrect. The measurement of 10.74 ft (from top of casing) in January 1997 was not due to the presence of sediment, but due to an absorbent pad floating on and protruding above the water. An absorbent pad, installed in monitoring well MW-8 to collect fugitive DNAPL oil droplets stirred up during DNAPL recovery activities, was not removed from the well prior to the 14 January 1997 monitoring of MW-8. The absorbent pad, due to its size, prohibited the water level indicator probe from passing it and contacting the water surface. Since the probe did not advance any further than 10.74 ft, field personnel erroneously concluded the well was filled with sediment. Following the 14 January 1997 monitoring event, the absorbent pad was removed from MW-8 since recoverable amounts of DNAPL have not been observed in this well since 3 November 1995. Since MW-8 is not filling with sediment, this well can still be utilized to monitor for DNAPL adjacent to the Saddle River and does not need to be redeveloped.

10. Hexcel will continue its product monitoring and recovery program.

11. No response needed.

12. Hexcel notes NJDEP comments concerning the use of bailers and will specify if a bailer is used for DNAPL measurement or recovery in the future.

13. Hexcel will collect groundwater samples from a representative set of monitoring wells to evaluate current site groundwater conditions. The sample plan will be included in Hexcel's July progress report.

14. No response needed.

III. Stream Sediments

1. Hexcel will prepare a proposal to trace the source of the storm sewer outfall that is approximately 600 to 650 feet downstream of the Hexcel site. The proposal will be included in Hexcel's comprehensive plan.

2. Hexcel will review the existing and new (see Item 1) data as well as Napp's ecological evaluation to determine whether additional investigation is needed.

IV. General Requirements

1. No response needed.

2. A revised remedial action schedule is enclosed as Table 1.

3. This letter is provided in response to the requirement to address the items of the NJDEP 27 May 1998 letter within 30 days of receipt of the letter. Plans for groundwater and surface water sampling will be included in the July progress report. A comprehensive plan for remediation of the Hexcel site is being developed and will be presented to the

NJDEP as soon as possible. Hexcel requests a meeting with the NJDEP in October to present its remediation plan.

4. No response needed.

5. No response needed.

6. No response needed.

7. No response needed.

8. At this time, there have been no changes to the estimates of costs for remediation of the site. Costs will be reevaluated within the comprehensive plan.

Please call if you have any questions concerning this response letter.

Sincerely yours,
HALEY & ALDRICH, INC.

Marjorie A. Piette
Project Manager

Joseph G. Savarese
Project Manager

Enclosure
C: A. William Nosil
Edward A. Hogan

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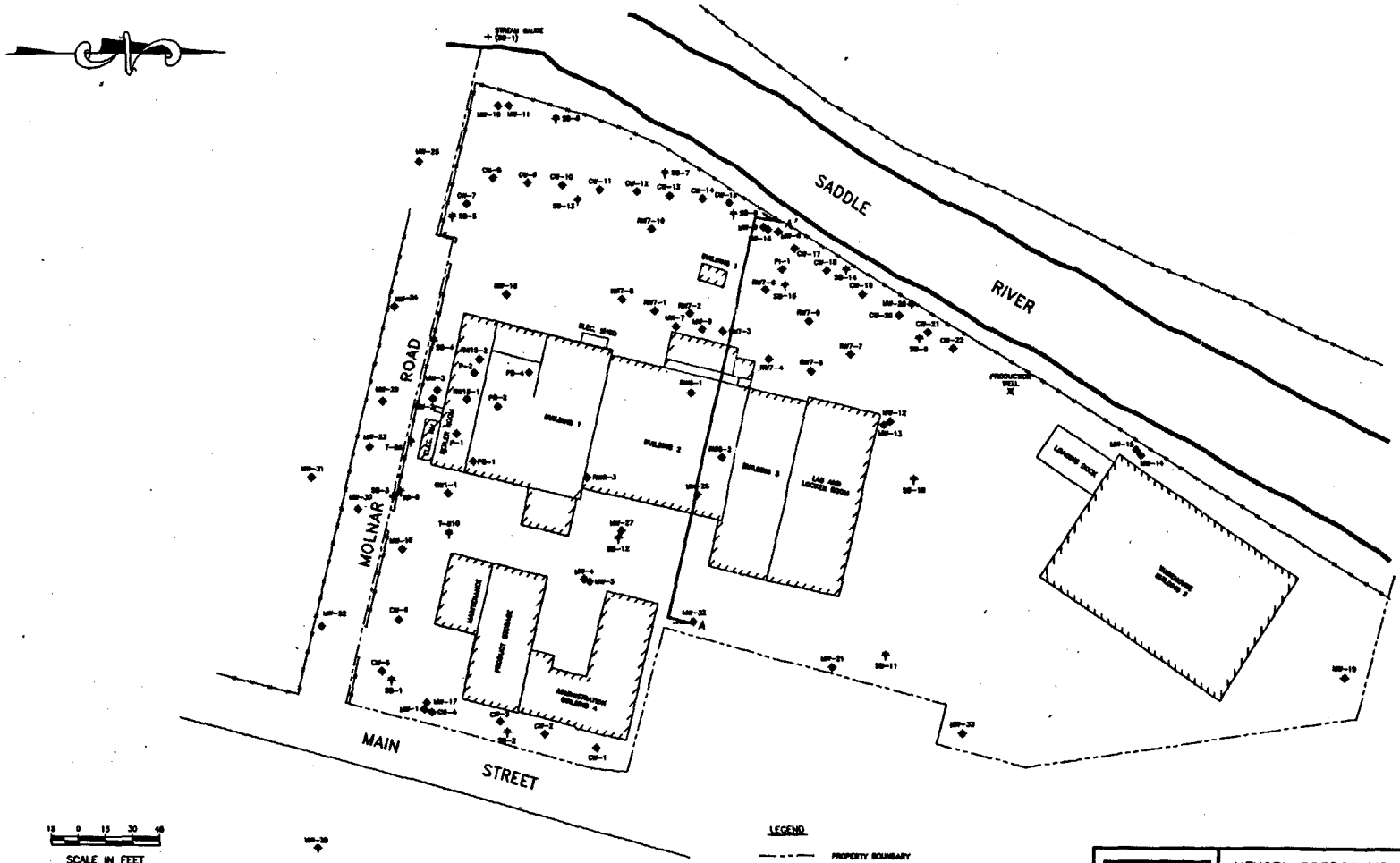

NOTES:
1. BASE PLAN PROVIDED BY KOLLAM ASSOCIATES.

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LOCATION OF CROSS SECTION A-A'

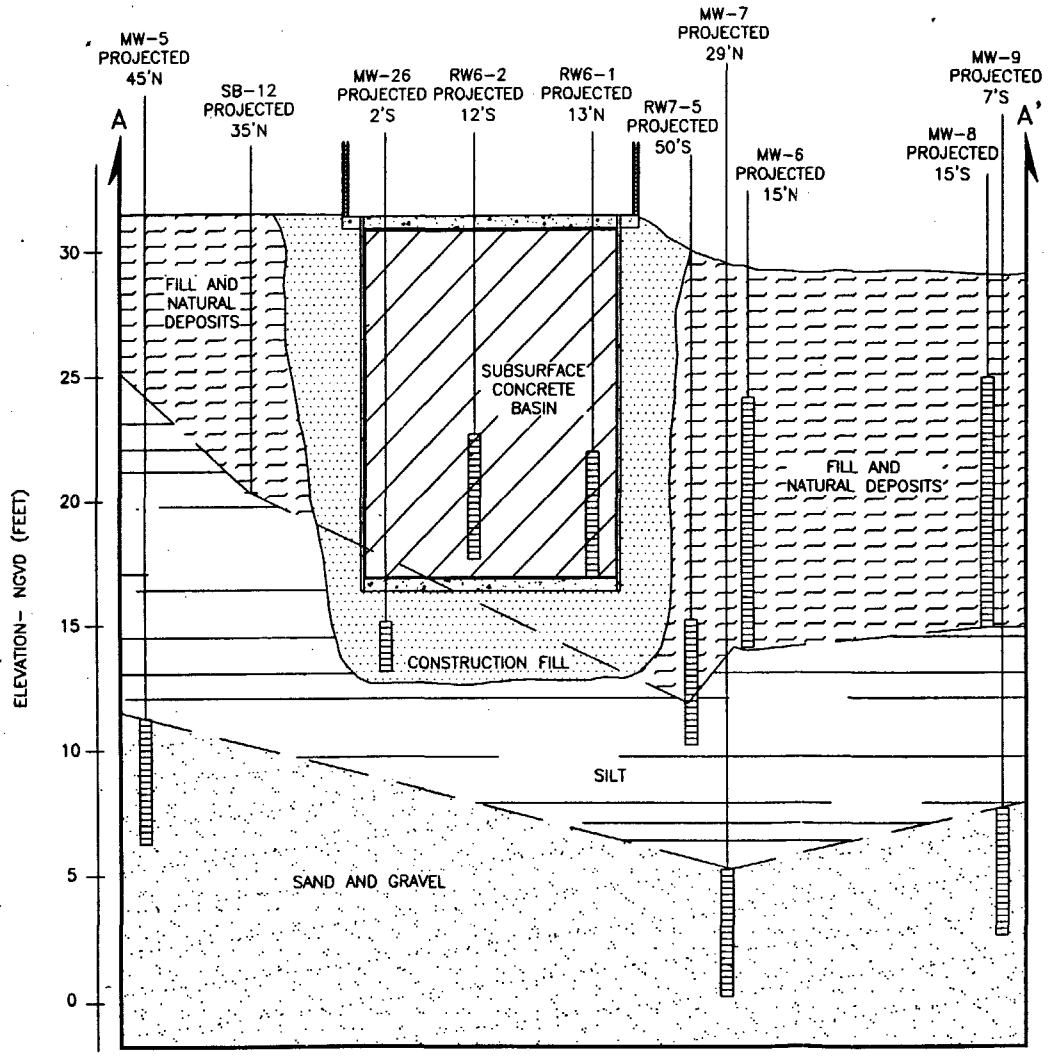
SCALE: AS SHOWN

JUNE 1998

FILE: 74167-02 SITEPLAN

FIGURE 1

882330006



LEGEND

CONCRETE

WELL SCREEN

NOTES:

1.) WELL SCREEN ELEVATIONS INFERRED FROM FIELD MEASUREMENTS AND WELL CONSTRUCTION DETIALS.

2.) SOIL ELEVATIONS INFERRED FROM BORING LOGS.

3.) SOIL INFORMATION FROM MW-27 (ADJACENT TO SB-12) WAS NOT UTILIZED SINCE THE BORING WAS NOT SAMPLED CONTINUOUSLY.

4.) BOTTOM OF CONCRETE BASIN INFERRED FROM BORING LOGS FOR MW-26 AND RW6-2.

0 15 30

HORIZONTAL SCALE IN FEET

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LODI, NEW JERSEY

CROSS SECTION A-A', SILT UNDER BUILDING 2

SCALE: AS SHOWN

JUNE 1998

FILE: 74167-02 XSECAA

FIGURE 2

TABLE I
ESTIMATED SCHEDULE OF REMAINING REMEDIAL ACTIVITIES
HEXCEL FACILITY
LODI, NEW JERSEY

TASK DESCRIPTION	1998 1	2	3	4	5	6	7	8	9	10	11	12
GROUNDWATER REMEDIATION												
DNAPL/LNAPL recovery (temporary)												
Recover water from basement of Bldg. 1												
Specs for demolition & select contractor												
Demolish bldgs & dispose debris & waste												
Collect, analyze & evaluate groundwater samples												
Collect, analyze & evaluate surface water samples**												
Reevaluate groundwater remedial plans												
Implement remedial plan												
CLEANING OF SEWER LINE												
Cleanout/abandonment of sewer line *												
Collect samples (and lab. analysis) *												
Disposal of sludge/debris *												
SOIL REMEDIATION												
Reevaluate soil data and remedial plans												
SEDIMENT SAMPLING												
Reevaluate sediment results												
Trace source of outfall *												
REPORTING												
Meet with NJDEP to propose remedial plan												
Prepare comprehensive remedial plan												
NJDEP review of remedial plan												
Prepare quarterly progress reports												
Prepare final report *												
NJDEP review and site inspection *												
Case closure *												

* Timing to be estimated within comprehensive remedial plan.

** To be initiated upon NJDEP response to proposal in July progress report.

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ESTIMATED SCHEDULE OF REMAINING REMEDIAL ACTIVITIES
HEXCEL FACILITY
LODI, NEW JERSEY

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Specs for demolition & select contractor												
Demolish bldgs & dispose debris & waste												
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Collect samples (and lab. analysis) *												
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NJDEP review and site inspection *												
Case closure *												

* Timing to be estimated within comprehensive remedial plan.

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